

ALEX G. TSE (CABN 152348)  
Acting United States Attorney  
SARA WINSLOW (DCBN 457643)  
Chief, Civil Division  
KIMBERLY FRIDAY (MABN 660544)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7102  
FAX: (415) 436-6748  
kimberly.friday@usdoj.gov

Attorneys for the United States

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES <i>ex rel.</i> KIMMARA	)	CASE NO. 17-2839-KAW
HOLLIS,	)	
	)	<b>JOINT STIPULATION OF</b>
Plaintiffs,	)	<b>VOLUNTARY DISMISSAL</b>
	)	
v.	)	
	)	
HYO KIM, <i>et al.</i> ,	)	
	)	
Defendants.	)	

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure and the *qui tam* provisions of the False Claims Act ("FCA"), 31 U.S.C. § 3730(b)(1), and in accordance with and subject to all of the terms and conditions of the settlement agreement among the United States, Relator, and Defendants, effective April 18, 2018, (the "Agreement"), the United States, Relator Kimmara Hollis ("Relator"), and Defendants Hyo Kim, Kate Kim, Francisco Coello, Francisco Coello Jr., and Sonia Dominguez ("Defendants") hereby stipulate as follows:

1. As to the United States, the claims against the Defendants are dismissed with prejudice, subject to all of the terms of the Agreement, as to the Covered Conduct released in the Agreement, and without prejudice as to any other claims.

- 1 2. As to Relator, all claims against Defendants are dismissed with prejudice, subject to all of the  
2 terms of the Agreement. Each party is to bear their own attorney's fees and costs.  
3  
4 3. According to the terms of the Agreement, this Court retains jurisdiction over any disputes  
5 that may arise regarding compliance with such terms.  
6  
7 4. A copy of the Agreement will be provided to the Court upon request.  
8  
9 A proposed order accompanies this notice.

10 **IT IS SO STIPULATED.**

11 Respectfully submitted,

12 ALEX G. TSE  
Acting United States Attorney

13 Dated: May 10, 2018

14 By: /s/  
KIMBERLY FRIDAY  
Assistant United States Attorney

15  
16 LAW OFFICES OF JASON HAIN

17  
18 Dated: May 10, 2018

19 By: /s/  
JASON HAIN  
Attorney for *Qui Tam* Plaintiff Kimmara Hollis

20  
21 DOWLING & MARQUEZ, LLP

22 Dated: May 10, 2018

23 By: /s/  
JAK STEVEN MARQUEZ  
Attorney for Defendants Hyo Kim, Kate Kim,  
24 Francisco Coello, Francisco Coello Jr., and Sonia  
25 Dominguez  
26  
27  
28

1 **CERTIFICATION**

2 Pursuant to Local Rule 5-1(i)(3), the undersigned hereby attests that Jason Hain and Jak Steven  
3 Marquez have concurred in the filing of this document and authorized me to sign it on their behalf.

4 ALEX G. TSE  
5 Acting United States Attorney

6 Dated: May 10, 2018 By: /s/  
7 KIMBERLY FRIDAY  
8 Assistant United States Attorney  
9  
10

11 **[PROPOSED] ORDER**

12 **PURSUANT TO STIPULATION, IT IS SO ORDERED.** The Court directs the Clerk to close  
13 the case.

14 Dated: 5/11/18  
15   
16 HON. KANDIS A. WESTMORE  
17 United States Magistrate Judge  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28